

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NORTHWEST IMMIGRANT RIGHTS
PROJECT, VANESSA OSORIO

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT,

Defendant.

Case No. 25-cv-517

COMPLAINT

INTRODUCTION

1
2 1. This case seeks “to learn about the circumstances of a[] [detained person’s] tragic
3 death in federal custody.” *Transgender L. Ctr. v. Immigr. & Customs Enf’t*, 46 F.4th 771, 777
4 (9th Cir. 2022). “The Freedom of Information Act exists for just such a purpose—to ensure an
5 informed citizenry, promote official transparency, and provide a check against government
6 impunity.” *Id.*

7 2. On October 22, 2024, Defendant U.S. Immigration and Customs Enforcement
8 (ICE) detained José Manuel Sanchez Castro (Mr. Sanchez) at the Northwest ICE Processing
9 Center (NWIPC) in Tacoma, Washington. After being taken into custody, Mr. Sanchez suffered
10 significant withdrawal symptoms. Five days later, on January 27, 2024, he was found dead while
11 in ICE custody at the NWIPC.

12 3. This lawsuit seeks all records related to Mr. Sanchez’s detention, medical care,
13 and death. It is the first step in seeking to hold ICE and the GEO Group, Inc. (GEO) accountable
14 for its actions in managing—or failing to manage—Mr. Sanchez’s withdrawal as required by
15 law. GEO is a private detention services company that operates the detention center pursuant to a
16 contract with ICE.

17 4. Mr. Sanchez is survived by his U.S. citizen wife, Plaintiff Vanessa Osorio, and
18 their children. Ms. Osorio seeks to hold ICE and GEO accountable for the untimely and tragic
19 death of her husband and children’s father.

20 5. Plaintiff Northwest Immigrant Rights Project (NWIRP) is a legal services and
21 advocacy organization that defends the rights of immigrant communities in Washington State,
22 including individuals detained at NWIPC. NWIRP seeks to ensure that ICE and GEO respect
23 those rights at NWIPC, including in the medical care provided to those detained at the facility.

PARTIES

12. Plaintiff Northwest Immigrant Rights Project (NWIRP) is a nonprofit 501(c)(3) organization. NWIRP provides free legal services to, and advocates on behalf of, immigrant communities in Washington State, including individuals placed in detention at the NWIPC.

13. Plaintiff Vanessa Osorio is the wife of Mr. Sanchez. She resides in Yakima, Washington.

14. Defendant U.S. Immigration and Customs Enforcement (ICE) is part of the U.S. Department of Homeland Security, and is the entity responsible for managing all aspects of the detention of noncitizens in immigration proceedings. ICE is an agency within the meaning of 5 U.S.C. § 552(f).

FACTUAL ALLEGATIONS

15. NWIPC is an ICE detention facility in Tacoma, Washington. Individuals detained at the facility are in civil detention and are there to complete their removal proceedings or to await removal.

16. NWIPC is operated by the GEO Group, a private company with whom ICE contracts to hold immigration detainees.

17. In late October 2024, ICE arrested José Manuel Sanchez Castro at his home in Eastern Washington. Mr. Sanchez was subsequently transferred to NWIPC.

18. Shortly after his arrest, Mr. Sanchez began to suffer withdrawal symptoms. He was placed in the medical housing unit at NWIPC at some point after his transfer to the facility.

19. On October 27, 2024, GEO and ICE health care employees found Mr. Sanchez dead in the medical housing unit to which he was assigned. Attempts to resuscitate him were unsuccessful.

1 20. ICE policies proscribe a range of procedures that the agency must take when
2 assessing a detained individual for medical needs, including as to people who exhibit withdrawal
3 symptoms.

4 21. These policies include ICE Directive 11747.2, which provides procedures for ICE
5 employees in cases of individuals who present suspected cases of substance use, intoxication, or
6 withdrawal. *See* ICE, Directive No. 11747.2, Patients with Substance Use, Intoxication, and
7 Withdrawal (Apr. 5, 2023), [https://www.ice.gov/doclib/foia/policy/directive11747.2_](https://www.ice.gov/doclib/foia/policy/directive11747.2_PatientsWithSubstanceUseIntoxicationWithd.pdf)
8 [PatientsWithSubstanceUseIntoxicationWithd.pdf](https://www.ice.gov/doclib/foia/policy/directive11747.2_PatientsWithSubstanceUseIntoxicationWithd.pdf).

9 22. That policy provides that the detention facility must screen individuals for
10 withdrawal upon intake, provide a behavioral health evaluation if a substance abuse concern is
11 present, and apply the Federal Bureau of Prisons' Clinical Practice Guidelines for Medically
12 Supervised Withdrawal to treat individuals experiencing withdrawal.

13 23. The policy also provides for monitoring and guidance of persons in withdrawal.

14 24. In addition, the directive instructs ICE employees to properly maintain records "in
15 accordance with an applicable National Archives and Records Administration (NARA) General
16 Records Schedule."

17 25. Other ICE policies also govern the medical care of detained persons at ICE
18 facilities, including its medical housing units directive, *see* ICE, Directive No. 11751.4, Medical
19 Housing Units (Mar. 25, 2016), [https://www.ice.gov/doclib/foia/policy/11751.4_](https://www.ice.gov/doclib/foia/policy/11751.4_MedicalHousingUnits_03.25.2016.pdf)
20 [MedicalHousingUnits_03.25.2016.pdf](https://www.ice.gov/doclib/foia/policy/11751.4_MedicalHousingUnits_03.25.2016.pdf), and ICE's Performance Based National Detention
21 Standards (PBNDs), *see* ICE, PBNDs (rev. 2016), [https://www.ice.gov/doclib/detention-](https://www.ice.gov/doclib/detention-standards/2011/pbnds2011r2016.pdf)
22 [standards/2011/pbnds2011r2016.pdf](https://www.ice.gov/doclib/detention-standards/2011/pbnds2011r2016.pdf).

1 26. Together, these policies and others require that ICE maintain certain records
2 regarding the intake and administration of medical care for noncitizens in ICE custody.

3 27. On December 5, 2024, just over a month after Mr. Sanchez's death, NWIRP sent
4 a preservation letter to GEO and ICE instructing them to preserve all records related in any way
5 to the events surrounding Mr. Sanchez's detention and death at the detention center in late
6 October 2024.

7 28. On January 21, 2025, Ms. Osorio, NWIRP, and UWCHR filed a FOIA request for
8 records related to Mr. Sanchez's medical care, detention, and death while he was in ICE custody
9 from October 22 to 27, 2024.

10 29. Among other records, the Requestors sought documents related to Mr. Sanchez's
11 medical care, including as to his intake, any medical assessments and evaluations performed on
12 him, treatment plans, the administration of medical care to him, and many other related medical
13 records.

14 30. Further, the Requestors sought records related to Section 504 of the Rehabilitation
15 Act, including any notices, correspondence, and related documentation for accommodations for
16 Mr. Sanchez.

17 31. Ms. Osorio, NWIRP, and UWCHR also requested copies of all documents in Mr.
18 Sanchez's detainee file, including "all paperwork generated by [Mr. Sanchez's] stay at the
19 facility." The Requestors specifically identified documents related to Mr. Sanchez's intake and
20 booking, screening, housing placement, and video and audio footage from the places in NWIPC
21 where Mr. Sanchez was detained.

1 32. Finally, the Requestors sought all records related to Mr. Sanchez's death,
2 including required notification documents, his death certificate, and a copy of the medical
3 examiner's and autopsy report.

4 33. In support of the FOIA submission, Requestors included proof of Mr. Sanchez's
5 death in the form of an ICE press release, a declaration from Ms. Osorio waiving any applicable
6 privacy protections, and a copy of Mr. Sanchez and Ms. Osorio's marriage certificate.

7 34. On January 27, 2025, NWIRP received an email from ICE acknowledging the
8 receipt of the FOIA request.

9 35. The email stated that, pursuant to 5 U.S.C. § 552(a)(6)(B), ICE would invoke a
10 ten-day extension of FOIA's twenty-business-day requirement for producing a response. *See* 5
11 U.S.C. § 552(a)(6).

12 36. Taking into account the ten-day extension, the agency's response to NWIRP's
13 FOIA request was due by March 5, 2025, at the latest.

14 37. ICE has not provided any response to Plaintiffs' FOIA request.

15 38. Requestors intend to use released records to determine whether GEO and ICE
16 must be held accountable for Mr. Sanchez's death. Specifically, they intend to review the records
17 to ensure that ICE and GEO complied with required policies and the appropriate standard of care
18 for those suffering from withdrawal. Based on that review, they may also take further action, if
19 warranted, such as producing a report or pursuing further legal action.

20 CLAIM FOR RELIEF

21 Violation of Freedom of Information Act 22 (Failure to Provide Timely Response to FOIA Request)

23 39. Plaintiffs repeat and re-allege the allegations contained in the preceding
24 paragraphs of this complaint as if fully set forth herein.

d. Grant any other and further relief that this Court deems just and proper.

DATED this 24th of March, 2025.

s/ Matt Adams
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s/ Glenda M. Aldana Madrid
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